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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
EUGENE DIVISION

SHANNON CRUZ, an individual,

Plaintiff,

v.

EXECUTIVE OFFICE OF UNITED
STATES ATTORNEYS, a department of
the United States Executive Branch,

Defendant.

Case No.: 6:20-CV-995

SECOND JOINT STATUS
REPORT

Pursuant to the order of the court entered on August 4, 2020, the parties are required to file the within Joint Status Report on or before November 18, 2020, including proposed deadlines for dispositive motions. On November 20, 2020, the Court granted leave to file this joint status report on or before December 2, 2020.

Given the unique posture of FOIA litigation, the parties jointly request the court allow the Government 90 days, or until March 2, 2021 to file dispositive motions. The parties anticipate that the Government may file both a motion to dismiss and a motion for summary judgment in this case. Responses to motions to be filed according to the requisite timeline. The parties also request that the court permit Plaintiff to file a combined response and cross-motion for summary judgment, and that Defendant be permitted to file a combined reply and response to Plaintiff's combined response and cross-motion.

DATED this 1st day of December, 2020.

By: s/Joshua B. Lay
Joshua B. Lay
HLP Law PC

By: s/Kevin C. Danielson
Kevin C. Danielson
US Attorney's Office